

LEWIS & LLEWELLYN LLP
MARC R. LEWIS (State Bar No. 233306)
KENNETH M. WALCZAK (State Bar No.
247389)
PETER C. SQUERI (SBN 286249)
DANIEL JORDAN (State Bar No. 313543)
601 Montgomery Street, Suite 2000
San Francisco, CA 94111
Tel.: (415) 800-0590
Fax: (415) 390-2127
Email: mlewis@lewisllewellyn.com
kwalczak@lewisllewellyn.com
psqueri@lewisllewellyn.com
djordan@lewisllewellyn.com

Attorneys for Plaintiff

ALBERT RICHARDS

LISA KOBIALKA (State Bar No. 191404)
KRAMER LEVIN NAFTALIS & FRANKEL LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
Email: lkobialka@kramerlevin.com

JONATHAN M. WAGNER (admitted *pro hac vice*)

KRAMER LEVIN NAFTALIS & FRANKEL LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-9100
Email: jwagner@kramerlevin.com

TODD A. ROBERTS (State Bar No. 129722)
MARTIN D. DIOLI (State Bar No. 172775)
ROPERS MAJESKI PC
535 Middlefield Road, Suite 245
Menlo Park, CA 94025
Telephone: (650) 364-8200
Facsimile: (650) 780-1701
Email: todd.roberts@ropers.com
martin.dioli@ropers.com

Attorneys for Defendants

CENTRIPETAL NETWORKS, LLC, STEVEN
ROGERS AND JONATHAN ROGERS

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ALBERT RICHARDS,

Plaintiff,

V.

CENTRIPETAL NETWORKS, LLC f/k/a
CENTRIPETAL NETWORKS, INC.;
STEVEN ROGERS; JONATHAN
ROGERS; and JOHN DOES 1-10.

Defendants.

Case No. 4:23-cv-00145-HSG

**STIPULATION TO EXTEND DEADLINE
TO TAKE DEPOSITION ORDER**

Local Civ. R. 6-1, 7-12

Judge: Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Civil Local Rules 6-1 and 7-12, the Parties hereby stipulate to and respectfully
2 request that the Court extend the deadline for the completion of depositions.

3 **STIPULATION**

4 WHEREAS, on August 15, 2024, the Court issued an order “permit[ting] Plaintiff to conduct
5 the depositions of the witnesses Defendants have agreed to produce voluntarily” and ordered that
6 “these depositions must be completed by September 6, 2024.” Dkt. 105 at 5.

7 WHEREAS, the Parties have met and conferred in good faith to promptly set the depositions
8 of the witnesses Defendants have agreed to produce voluntarily, including Defendants Jonathan
9 Rogers and Steven Rogers.

10 WHEREAS, the deposition of Jonathan Rogers, in his individual capacity and as a corporate
11 representative, is scheduled for September 5, 2024.

12 WHEREAS, Steven Rogers, who is currently in France, is not available for a deposition by
13 September 6, 2024.

14 WHEREAS, following discussions, the Parties have agreed that, with the Court’s
15 permission, they would proceed with the deposition of Steven Rogers before September 20, 2024.

16 WHEREAS, the Parties respectfully submit that the requested relief would not unduly
17 impact the Court’s case schedule.

18 THEREFORE, the Parties, through their counsel, hereby stipulate and respectfully request
19 that the Court extend the deadline for the Parties to take depositions through September 20.

20 **IT IS SO STIPULATED.**

21 Dated: September 3, 2024

LEWIS & LLEWELLYN LLP

22 By: */s/ Peter C. Squeri*

23
24 Marc R. Lewis
25 Kenneth M. Walczak
Peter C. Squeri
Daniel Jordan

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27 Attorneys for Plaintiff
ALBERT RICHARDS

1
2 Dated: September 3, 2024

KRAMER LEVIN NAFTALIS & FRANKEL
LLP

3 By: /s/ Jonathan M. Wagner

4 Jonathan M. Wagner

5 Attorney for Defendants
6 CENTRIPETAL NETWORKS, LLC,
7 JONATHAN ROGERS, and STEVEN ROGERS

8 **SIGNATURE ATTESTATION**

9 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this
10 joint case management statement has been obtained from each signatory herein.

11 Dated: September 3, 2024

LEWIS & LLEWELLYN LLP

12 By: /s/ Peter C. Squeri

13 Peter C. Squeri

14
15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Parties may take depositions
16 through September 20, 2024.

17
18 Date: 9/4/2024



19
20 Hon. Haywood S. Gilliam, Jr.
21 United States District Judge
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